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17 UNITED STATES DISTRICT COURT

18 EASTERN DISTRICT OF CALIFORNIA

19 THE UNITED STATES OF AMERICA,

20 Case No.: 2:23-CR-000314-DAD

21 Plaintiff,

22 vs.

23 RAMON ROBLEDO GARCIA,

24 Defendant.

25 STIPULATION AND ORDER TO
26 CONTINUE JUDGMENT AND
27 SENTENCING HEARING

28
17 STIPULATION

18 Plaintiff, United States of America, by and through its counsel of record, and Defendant Ramon
19 Robledo Garcia, by and through her counsel of record, hereby stipulate as follows:

- 21 1. On January 23, 2024, Defendant pled guilty to the sole count of the Information and the
22 matter was referred to the Probation Office for preparation of a probation investigation
23 report.
- 24 2. The matter is presently set for judgment and sentencing on September 17, 2024.
- 25 3. Defense notified the Government of the need for additional time to gather, analyze and
26 present information relevant to the Court's consideration of the 18 U.S.C. 3553(a) factors
27 before the imposition of sentence. Having considered defense counsel's request, the

1 Government has no opposition to the requested date. Similarly, Probation Officer
2 Miranda Lewis of US Probation also has no opposition to this request.

- 3
- 4 4. Therefore, by this stipulation, Defense respectfully requests that this Court continue the
5 date for judgment and sentencing hearing until January 7, 2025.
- 6 5. Defense also kindly requests that all dates pertinent to the preparation of the Presentence
7 Investigation Report be adjusted accordingly to reflect the new sentencing date of
8 January 7, 2025, as follows:

- 9
- 10 a. Judgment and Sentencing: January 07, 2025
- 11 b. Reply, or Statement of Non-Opposition: December 31, 2024
- 12 c. Formal Objections to the Presentence Report
shall be filed with the Court and served on the Probation
Officer and Opposing Counsel no later than: December 24, 2024
- 13
- 14 d. Final Presentence Report December 17, 2024
- 15 e. Counsel's informal written objections shall be
delivered to the Probation Officer and Opposing Counsel
no later than: December 10, 2024
- 16
- 17 f. Draft Presentence Report shall be disclosed to counsel
no later than: Already Disclosed

- 18
- 19 6. Because the Defendant has pled guilty, the provisions of the Speedy Trial Act do not
apply to this request.
- 20
- 21

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23 IT IS SO STIPULATED.

Respectfully submitted,

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25 Dated: September 9, 2024

PHILLIP A. TALBERT
United States Attorney

26

27 _____/s/ David W. Spencer _____
DAVID W. SPENCER
28 Assistant United States Attorney

1 Dated: September 9, 2024

_____/s/ Mary Ann Bird_____
2 MARY ANN F. BIRD
3 Attorney for RAMON ROBLEDO GARCIA

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7 **FINDINGS AND ORDER**

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9 The Court hereby continues the judgment and sentencing hearing to January 7, 2025, at

10 9:30 A.M. All dates previously set for the preparation of the Presentence Investigation Report

11 and for the filing of documents with the Court are reset consistent with judgment and sentencing

12 hearing date of January 7, 2025.

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14 IT IS SO ORDERED.

15 Dated: September 10, 2024

Dale A. Drozd

16 DALE A. DROZD
17 UNITED STATES DISTRICT JUDGE